

AO 91 (Rev. 08/09) Criminal Complaint

FILED  
JAN 27 2020Mark C. McCarthy, Clerk  
U.S. DISTRICT COURT

## UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

United States of America )  
 v. )  
 )  
 )  
 )  
 )  
 JEFFREY RAHN REETZ )  
 \_\_\_\_\_

Defendant(s)

Case No. 20-mj-29-FAM

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March of 2019 to January 23, 2020 in the county of Rogers in the Northern District of Oklahoma, the defendant(s) violated:

## Code Section

## Offense Description

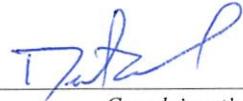
Title 18, United States Code 922(g)  
(1)

Possession of Firearm by Prohibited Person

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.



Complainant's signature

DUSTIN CARDER, SPECIAL AGENT H.S.I.

Printed name and title

Sworn to before me and signed in my presence.

Date: 1-27-20



Judge's signature

Frank H. McCarthy, United States Magistrate Judge

Printed name and title

City and state: Tulsa, OK

**AFFIDAVIT**

1. I, Dustin Carder, have been employed by Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) as a special agent since December 2018. I am assigned to the HSI Tulsa office. Within this office, I conduct investigations in numerous areas of federal law to include, but not limited to: narcotics, immigration, financial fraud, child exploitation, and gangs. I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. § 922(g), and am authorized by the Secretary of the Department of Homeland Security.

2. Prior to becoming a special agent, I was employed as a deputy sheriff with the Tulsa County Sheriff's Office in Tulsa, Oklahoma for over twelve (12) years. During my tenure as a deputy sheriff, I spent over six (6) years on patrol where I conducted numerous criminal investigations, made hundreds of arrests, and conducted interviews of suspects, victims, and witnesses. Prior to becoming a HSI Special Agent, I was a Task Force Officer (TFO) with HSI for approximately two and a half years. While on the task force, I conducted and/or assisted in investigations involving narcotics trafficking, bulk cash smuggling, child exploitation, organized criminal activity, and prohibited persons in possession of firearms and ammunition. I am a graduate of the Federal Law Enforcement Training Center's (FLETC) twelve-week Criminal Investigator Training Program (CITP) and the sixteen-week Homeland Security Investigations Special Agent Training (HSISAT) program.

3. It is my belief that **Jeffrey Rahn REETZ**, a United States citizen, has violated 18 U.S.C. § 922(g)(1) (it shall be unlawful for any person who has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year to ship or transport in interstate or foreign commerce, or possess in or affecting commerce, any firearm or ammunition; or to receive any firearm or ammunition which has been shipped or transported in interstate or foreign commerce) in that on or about January 23, 2020, he was found to be in possession of nine (9) firearms and hundreds of rounds of ammunition in Claremore, Oklahoma, in the Northern District of Oklahoma, after being previously convicted in Tulsa County District Court on January 27, 2011, for Carrying a Weapon Where Alcohol is Served, a State of Oklahoma felony, punishable by imprisonment for a term exceeding one year. As a result of the felony conviction, **REETZ** received a three (3) year suspended sentence under the custody and control of the Oklahoma Department of Corrections.

The source of my information and grounds for my beliefs are as follows:

4. In March 2012, HSI Phoenix initiated an investigation into a fee-based, members-only website selling child exploitation material. This member's only website was found to contain multiple images and videos depicting child pornography and child erotica. **Jeffrey REETZ**, who resides in Claremore, Oklahoma, in the Northern District of Oklahoma, appears to have purchased multiple files of child exploitation material from the member's only website from January 2017-November 2018. HSI Phoenix sent the

information to HSI Tulsa for further follow up and investigation.

5. HSI Tulsa began investigating the information received from HSI Phoenix. As part of the investigation, I reviewed **REETZ**'s criminal history and discovered that he was arrested in October 2010 by the Tulsa Police Department on state charges of Feloniously Pointing a Firearm, Carrying a Weapon Where Alcohol is Served, and Carrying a Firearm While Under the Influence of Drugs or Alcohol. On January 27, 2011, **REETZ** pleaded guilty in Tulsa County District Court to the charge of Carrying a Weapon Where Alcohol is Served, which is a felony in the state of Oklahoma. **REETZ** was given a three-year suspended sentence, and also had to serve thirty (30) days at the Oklahoma Department of Corrections' Avalon Center, which is a transitional living facility for convicted felons. The other two charges were dismissed.

6. Information received from HSI Phoenix included archive files that had been purchased by **REETZ** on the members-only child exploitation website. HSI Phoenix agents were able to obtain imaged copies of the servers hosting the child exploitation website. Preliminary review of the files purchased by **REETZ** revealed approximately 9,000 Category 1 child exploitation images and videos with either the lewd and lascivious display of a child's genitalia and/or a child engaged in a sex act.

7. During the course of my investigation, physical and aerial surveillance were conducted at **REETZ**'s residence in Claremore, Oklahoma. I conducted aerial surveillance of **REETZ**'s residence with the assistance of Customs and Border Protection's Air and Marine Operations (CBPAMO). I had previously requested CBPAMO's assistance with

aerial surveillance in anticipation of the service of a search warrant due to the residence sitting by itself on approximately six acres of land and all of the house is not visible from the road. CBPAMO is a surveillance tool that is typically utilized in these types of situations.

8. During the surveillance, I observed what appeared to be a hanging steel shooting target at the far south end of the property, near the wood line. The area around the target was overgrown; however, there was a mowed, maintained straight path from the backyard of the residence to the steel target. Based on my training and experience, this appeared to be set up for long range shooting, which typically requires a rifle or firearm with a scope.

9. On January 15, 2020, I obtained search and seizure warrants for **REETZ**'s residence, business, vehicle, his person, and email account in relation to this investigation. The warrants were authorized and signed by the Honorable United States Magistrate Judge Frank H. McCarthy in the Northern District of Oklahoma. Among the items authorized to be seized were any and all firearms, of known or unknown manufacture, model, or caliber, with known or unknown serial number, and ammunition.

10. On January 23, 2020, HSI Special Agents (SA), Task Force Officers (TFO), Officers from the Tulsa Police Department Cyber Crimes Division, and Investigators from the Oklahoma Department of Corrections (DOC) executed the federal search and seizure warrant at the residence of **Jeffrey REETZ** at 9574 East Highway 20, Claremore, Oklahoma, which is in the Northern District of Oklahoma.

11. After agents knocked and announced their presence at the residence, **REETZ** opened the door and was detained. Also present at the residence was Angela Teague, **REETZ**'s girlfriend, and Angela Teague's disabled son, Brandon Teague.

12. As a result of the search and seizure warrant, the following firearms and ammunition were seized at the residence:

- a. A Mosin-Nagant Model: M913P bolt-action 7.62 caliber rifle with serial number: 9130397076
- b. A Kimber Crimson Trace .45 caliber pistol with serial number: K600589
- c. A Beretta Model: M9A3 9mm pistol with serial number: BER745602
- d. A Springfield Arms Model: M1903 bolt-action .30 caliber rifle with serial number: 9593
- e. A Derringer Model: C32 .32 caliber pistol with serial number: 017283
- f. A New Haven Mossberg Model: 600AT 12 gauge shotgun with serial number: H2364
- g. A Savage Arms Model: MSR .223 caliber rifle with serial number: 01001419
- h. An Olympic Arms 12 gauge shotgun with serial number: unavailable
- i. A Hopkins & Allen Model: Blue Jacket .22 caliber revolver with

serial number: unavailable

- j. 670 rounds of 9mm ammunition
- k. 435 rounds of .45 caliber ammunition
- l. 76 rounds of 7.62 caliber ammunition
- m. 85 rounds of 5.56 caliber ammunition
- n. 38 rounds of .223 caliber ammunition
- o. 103 rounds of .357 caliber ammunition
- p. 12 rounds of 12 gauge shotgun ammunition
- q. Two (2) rounds of .32 caliber ammunition

13. All of the firearms were found either in **REETZ**'s upstairs office, the master bedroom, or a closet in the master bedroom bathroom. **REETZ**'s identification and phone were found on a nightstand next to the bed in the master bedroom, along with Angela Teague's cell phone and identification on the opposite nightstand.

14. **REETZ** was interviewed at the scene by agents. I read **REETZ** his Miranda Rights, which he waived by signing the Miranda Rights waiver form, acknowledging that he would answer questions without an attorney present. During the interview, **REETZ** admitted that he was a felon. He stated that the guns in the bedroom closet belonged to his son. He stated he did not think it was a big deal that his son kept guns there. **REETZ** stated that he was unaware that as a felon he was not allowed to possess firearms. (It is also noteworthy that **REETZ** has a Juris Doctorate law degree.)

15. **REETZ** stated that there were rifles, shotguns and handguns that his son kept in the master bedroom closet. He stated that some of the guns on his office wall, such as the Mosin-Nagant, were operable. **REETZ** further claimed in the interview that he does not shoot the guns. Upon review of Angela Teague's cell phone pursuant to the search warrant, I saw multiple videos of **REETZ** shooting firearms, most of which appeared to have occurred in the backyard of his residence.

16. I informed **REETZ** that he could not possess firearms as a felon and he replied, "What is the definition of possess?" I told him it being in his residence and in his dominion and control. **REETZ** then smiled.

17. Based on my training and experience as a law enforcement officer, conversations with more experienced agents/officers, and firearms research, I know that none of the firearms seized at **REETZ**'s residence were manufactured in the State of Oklahoma. All of the firearms were manufactured in a different state or country, thereby affecting interstate commerce, as each firearm had to be shipped from its manufacturing facility outside the State of Oklahoma to a licensed dealer in the State of Oklahoma for its original sale; or the firearms were acquired outside the State of Oklahoma and transported/shipped from across state lines into the State of Oklahoma.

18. Based on the foregoing, it is my belief that **REETZ** has violated 18 U.S.C. § 922(g) in that on or about January 23, 2020, he was found to be in possession of nine (9) firearms and hundreds of rounds of ammunition in Claremore, Oklahoma, in the Northern

District of Oklahoma, after being previously convicted in Tulsa County District Court on January 27, 2011, for Carrying a Weapon Where Alcohol is Served, a State of Oklahoma felony, punishable by imprisonment for a term exceeding one year.



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Dustin Carder  
Special Agent  
Homeland Security Investigations

Subscribed and sworn to before me on this 27<sup>th</sup> day of January, 2020.



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HON. FRANK H. McCARTHY  
UNITED STATES MAGISTRATE JUDGE